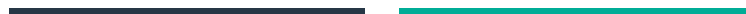


nuveen

A TIAA Company

Minor Non-Monetary Benefits Disclosure

Nuveen Asset Management Europe S.à r.l. Germany



Minor Non-Monetary Benefits Disclosure

Nuveen Asset Management Europe S.à r.l. Germany (hereby referred to as “**Nuveen**”) is dedicated to provide investment services to its clients in an honest, fair and professional way.

Nuveen may provide or receive certain acceptable minor non-monetary benefits listed in the relevant EEA member state national implementation of Article 12(3) of Commission Delegated Directive (EU) 2017/593, which may include:

- information or documentation relating to a financial instrument or an investment service, that is generic in nature or personalised to reflect the circumstances of an individual client;
- written material from a third party that is commissioned and paid for by a corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any investment firms wishing to receive it or to the general public;
- participation in conferences, seminars and other training events on the benefits and features of a specific financial instrument or an investment service;
- hospitality of a reasonable de minimis value, such as food and drink during a business meeting or a conference, seminar or other training events mentioned above; and
- other minor non-monetary benefits which an EEA member state deems capable of enhancing the quality of service provided to a client and, having regard to the total level of benefits provided by one entity or group of entities, are of a scale and nature that are unlikely to impair compliance with an investment firm's duty to act in the best interest of the client.

Other minor non-monetary benefits:

Pursuant to the relevant EEA member state national implementation of Article 11(5)(a) of Commission Delegated Directive (EU) 2017/593, certain minor non-monetary benefits that Nuveen may provide or receive, may be described in a generic way and these may include:

- Real estate analysis;
- Prizes of a reasonable de minimis value from sales competitions/awards;
- Training materials provided or received in the context of training events mentioned above;
- Participation in industry or investors' fairs;
- Promotional information materials;
- Promotional gifts up to a value determined from time to time in Nuveen's policies.

This list of examples is non-exhaustive and subject to change.